

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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NATIFAH COOPER,

Plaintiff,

-against-

POLICE OFFICER PAUL DIEUGENIA,

14-CV-6136 (PKC)

Defendant

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JULIENE DREI MUNAR declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, as follows:

1. I am an associate at the Law Office of Robert Marinelli.
2. I submit this declaration in support of plaintiff's motion for legal fees, costs and expenses, pursuant to 42 U.S.C. §1988 and in accordance with the terms of the judgment that was entered in favor of plaintiff against the defendant Paul Dieugenia, on October 26, 2017.
3. I worked on this matter with Robert Marinelli, and Co-Counsel, Ryan Lozar.
4. I graduated from the University of California at Berkeley with a B.A. in 2010 and graduated I from New York University School of Law in 2014.
5. I joined the Law Office of Robert Marinelli in 2016.

6. As an associate, I handle discovery, take and defend depositions, write discovery and dispositive motions, participate in trial preparation, and conduct direct examinations of witnesses at trial.

7. Before joining Law Office of Robert Marinelli, I practiced as a civil rights litigator at Wigdor LLP, where I specialized in employment discrimination actions.

8. During my time Wigdor LLP, I handled a civil rights case involving claims of excessive force, false arrest, false imprisonment, and malicious prosecution. I participated in all aspects of matter, including taking and defending depositions.

9. During law school, I worked on civil rights and employment discrimination matters as a law clerk at Sanford Heisler LLP and Outten & Golden LLP.

10. I received my B.A. from the University of California, Berkeley in 2010, and my J.D. from New York University School of Law in 2014.

11. I worked a total of 235.9 hours in this matter, See Exhibit 3, however I am submitting a bill for 173.5 hours, See, Exhibit 5. I do this to ameliorate concerns about duplication of work between counsels.

12. Based upon the attached time records, I am billing \$51,450 in attorney's fees on plaintiff's behalf for the work I performed as of the date of the entry of Judgment, which represents 173 hours at an hourly rate of \$300.

Dated: New York, New York
December 23, 2017

/s/
Drei Munar